



COLSF 8.9.1 v1

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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April 9, 1997

Bill Wedlake
Spokane County Utilities
1026 W. Broadway
Spokane, WA 99260

Dear Mr. Wedlake:

Re: Colbert Landfill/Meeting of April 3, 1997

This letter is a follow up to our meeting of April 3, 1997. After further consideration, we will require additional information before giving the County our decision on invalidating the target drawdown method and substituting a contour method. We also want the County to immediately implement increased pumping in an attempt to overcome the water problem in the lower aquifer, or else provide by April 21, 1997, a rationale and technical justification for not increasing the pumping. In our review of the Consent Decree, it is very clear that the goal of the extraction system(s) is to capture the contaminated groundwater. It is also unclear to Ecology as to when the County reported the problem with the target draw down method. Specific comment follows:

At the meeting we reviewed computer plots of fluctuating groundwater levels in one or deep extraction well. Although we agreed that the fluctuations justified invalidity of the target drawdown method for the well presented, we were not provided the plots for all the wells. If only one or two wells are significantly effected, then the pumping rates should be increased in those wells in an attempt to overcome the fluctuations. We would like to review the computerized plots of the water levels in all deep extraction wells before we move any further to invalidate an entire method of evaluation and substitute another. Please send the plots to EPA and Ecology by April 28, 1997.

We also agreed that the current pumping rate in the deep aquifer is not providing capture. We very briefly discusse

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The Consent Decree makes it clear that the goal of the extraction system(s) is to capture the contaminated groundwater so that contamination is not spread further into the aquifer(s). All the pertinent design documents discuss capture zones for the systems, as do the significant reporting documents. We consider the County to still be under the obligation to work toward the goal. If we agree to invalidate the current method of target draw downs, the new method of evaluation will have to work toward that goal. In our opinion, what has been proposed under the new method does not work toward the goal of capture.

It is unclear to Ecology when the County reported the problem with the target draw down method. While this problem is discussed in the draft aquifer management plan, a draft plan is not the appropriate place to report such a problem. When did the County report this problem to EPA and the Ecology? How was it reported to EPA and the Ecology? In our opinion, the deep extraction wells have not been providing capture for several months, yet a course of action was not discussed until April 3, 1997. The most current status report we have is for the third quarter of 1996. We are not getting adequate communication, nor is information being provided in a timely manner.

If you have any questions about this letter, or if you are unable to meet the dates for submittals, please contact me at (360) 407-7239.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael Kuntz".

Michael Kuntz

MK:gj

cc: Neil Thompson, EPA
Steve Holderby, Spokane County Health District